

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

BRYNDON FISHER and BRUCE REID,
derivatively on behalf of Federal National
Mortgage Association,

Plaintiffs,

v.

THE UNITED STATES OF AMERICA,

Defendant.

and FEDERAL NATIONAL MORTGAGE
ASSOCIATION,

Nominal Defendant.

ERICK SHIPMON, derivatively on behalf
of Federal National Mortgage Association,

Plaintiff,

v.

THE UNITED STATES OF AMERICA,

Defendant.

and FEDERAL NATIONAL MORTGAGE
ASSOCIATION,

Nominal Defendant.

Case No. 13-cv-00608-MMS
(Judge Sweeney)

Case No. 13-cv-00672-MMS
(Judge Sweeney)

**PLAINTIFFS' MOTION FOR CONSOLIDATION OF SHAREHOLDER
DERIVATIVE ACTIONS AND APPOINTMENT OF LEAD COUNSEL**

Pursuant to Rules of the Court of Federal Claims 42(a) and 83.1(c), Plaintiffs Bryndon Fisher, Bruce Reid, and Erick Shipmon (collectively, the “Derivative Plaintiffs”), respectfully move this Court for an order (1) consolidating the two shareholder derivative actions pending in this Court captioned *Fisher v. United States*, No. 13-cv-00608-MMS and *Shipmon v. United States*, No. 13-cv-00672-MMS (together, if consolidated, the “Consolidated Derivative Action”) and (2) appointing Robert C. Schubert of Schubert Jonckheer & Kolbe LLP as Lead Counsel and Attorney of Record for the Consolidated Derivative Action.

The Derivative Plaintiffs submit herewith a memorandum of law setting forth the reasons, relevant facts, and legal authorities in support of their motion. A proposed order is also submitted herewith.

DATED: October 29, 2013

Respectfully submitted,

SCHUBERT JONCKHEER & KOLBE LLP

BY: /s/ Robert C. Schubert
ROBERT C. SCHUBERT

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